

Request for Reconsideration dated February 20, 2004

Reply to Office Action of October 22, 2003

REMARKS/ARGUMENTS

Claims 1-5 and 8-19 are pending. Claims 6 and 7 are allowed, claims 1, 5, 8-14, 16, 17, and 19 are rejected, and claims 2-4, 15, and 18 are objected to.

Reconsideration of the application is respectfully requested for the following reasons.

The Office Action rejected claims 1, 5, 8-14, 16, 17, and 19 under 35 U.S.C. § 103(a) as being unpatentable over Nishio et al. (hereinafter "Nishio"), U.S. Patent No. 5,995,666, further in view of Fraser et al. (hereinafter "Fraser"), U.S. Patent No. 5,430,486. Applicants respectfully traverse the rejection.

Claim 1 recites broadly the embodiments of the invention disclosed in the specification. In particular, this claim recites a picture terminal which comprises "a first core part that encodes a moving picture at a first quantizing value corresponding to a first display resolution or encodes a frame unit still picture with a corresponding second higher resolution, a VLC that encodes data encoded at the first core part in lengths different from each other and an output unit that outputs an encoded bit stream of an output data of the VLC." Nishio does not disclose such features.

Nishio discloses a still picture transmission system comprising a transmitter and a receiver. The transmitter includes a still picture generator, an entry number generator, and a picture information generator. In operation, a list data is generated containing the entry numbers and corresponding picture information and an encoder encodes the video data inserted in a predetermined position corresponding to each still picture. Furthermore, a

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multiplexer multiplexes and transmits the encoded video signal with the list data. The receiver then separates the encoded video signal and list data.

The Office Action acknowledges that "Nishio is silent about encoding high resolution image data" on page 2. In fact, Nishio does not teach or suggest any resolution regarding encoding of still and moving pictures. However, the Office Action then argues that "it would have been obvious to incorporate a high resolution video image and still image transmission and storage process," as taught by Fraser.

Fraser does not teach or suggest encoding using different resolution to encode a still picture and a moving picture. More specifically, Fraser does not teach or suggest encoding "a moving picture at a first quantizing value corresponding to a first display resolution" or "a frame unit still picture with a corresponding second higher resolution." Rather, Fraser discloses a simple transformation of a high resolution video image, still, or full motion, into a number of segments, each of which can be converted into a standard NTSC or PAL television frame. Therefore, Fraser fails to overcome the deficiencies of Nishio as Fraser merely teaches a transformation of a high resolution video image being converted to a standard television signal.

Applicant notes that claim 5 is allowable since claim 5 depends from claim 4 which has been indicated to be allowable by the Examiner. Notwithstanding this dependency, with respect to claim 5, Nishio does not teach or suggest "the VLC repeatedly encode a single frame data stored in the frame memory." (emphasis added) Rather, Nishio discloses "image data generator 100 generates a series of thousand frames of different Renaissance paintings

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repeatedly, and image data generator 101 generates a series of thousand frames of different modern paintings repeatedly.” See column 3, lines 32-37 of Nishio.

With respect to claim 8, Nishio does not teach or suggest using a different resolution to encode moving and still picture data. More specifically, Nishio does not teach or suggest “extracting one of a frame unit of still pictures in a moving picture, encoding one of the extracted still picture in the moving picture, and extracting the encoded still picture at a higher resolution than the encoded moving picture.”

As discussed above, Fraser does not make up for these deficiencies of Nishio, but only discloses a simple transformation of a high resolution video image into a number of segments, each of which can be converted to a standard NTSC or PAL television frame. Therefore, Fraser fails to overcome the deficiencies of Nishio as Fraser merely teaches transformation of a high resolution video image which can be converted to a standard television signal.

Claim 13 recites a method for transporting a still picture which encodes “the stored frame unit of still pictures repeatedly until the still pictures have a prescribed resolution and transmitting the still picture having the prescribed resolution.” (emphasis added) Nishio does teach or suggest such features.

As discussed above, Nishio does not encode the stored frame unit of still pictures repeatedly until the still pictures have a prescribed resolution but “generates a series of thousand frames of different Renaissance paintings repeatedly... generates a series of thousand frames of different modern paintings repeatedly.” See col. 3, lines 32-37.

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Moreover, there is no disclosure in Nishio of achieving “a prescribed resolution and transmitting the still picture having the prescribed resolution.”

With respect to claim 17, Nishio does not teach or suggest using a decoder frame memory to store picture data in a transmitter. More specifically, Nishio does not teach or suggest “a method for transporting a still picture by a picture terminal having an encoder with a first frame memory and a decoder with a second frame memory for transmission of picture, comprising receiving and storing a still picture frame in the second frame memory of the decoder and encoding the still picture frame stored in the second frame memory before transmission.” Moreover, there is no disclosure in Nishio of a picture terminal that utilizes a decoder with a second frame memory for transporting a still picture.

As discussed above, Fraser does not make up for these deficiencies of Nishio, but only discloses a simple transformation of a high resolution video image into a number of segments, each of which can be converted to a standard NTSC or PAL television frame. Therefore, Fraser fails to overcome the deficiencies of Nishio as Fraser merely teaches transformation of a high resolution video image which can be converted to a standard television signal.

In view of the foregoing, it is respectfully submitted that the rejection of independent claims 1, 8, 13, and 17 under 35 U.S.C. § 103(a) as being unpatentable over Nishio in view of Fraser should be withdrawn. Dependent claims 2-5, 9-12, 14-16 and 18-19, which depend from claim 1, 8, 13, and 17, respectively, are allowable at least for the reasons discussed

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above. With respect to independent claims 1, 8, 13, and 17, as well as for their added features.

Applicants wish to thank Examiner Kassa for the indication of allowable subject matter on pages 4 and 5 of the Office Action. Claims 2-5, 15, and 18 were objected to as being dependent upon a rejected base claim but were indicated as being otherwise allowable. Based on the discussion above, independent claims 1, 13, and 17 should be in condition for allowance, from which dependent claims 2-5, 15, and 18 depend, respectively.

With respect to allowed claims 6 and 7, Applicants recognize the "statement of reasons for allowance" on page 5. However, Applicants cannot acknowledge these statements, for the purposes of prosecution history estoppel, as the statements do not correspond to the exact recitations of the claims.

In view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, **Samuel W. Ntiros**, at the telephone number listed below. Favorable consideration and prompt allowance are earnestly solicited.

Serial No. 09/619,615

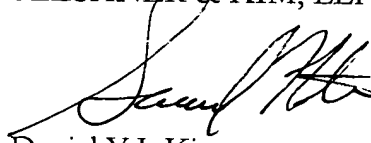
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Respectfully submitted,
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